

September 18, 2025

U.S. Department of Agriculture, USDA Forest Service
2025 Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests
Forest Supervisors Office, 236 pp

Re: Comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests as they are pertinent to **Public Law 111-274**

Dear Sir:

Enclosed are my comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) and the Plain Writing Act of 2010. I have written separate comments on MINING, GRAZING, RECREATION, and these are enclosed.

At the August 25, 2025 Natural Resources Advisory Committee meeting, where I am a member, Wallowa-Whitman National Forest Supervisor, Shaun McKinney told me that my comments on the Draft Plan were without merit. He told the committee that the Draft Plan was a good one and he had personally written parts of the Plan.

I do not agree with the Forest Supervisor's opinion that the document is clear, concise, and organized in a manner that can be read and understood by the general public.

Readability

The Plain Writing Act of 2010, also known as Public Law 111-274, requires all federal agencies to use plain language in all new and revised documents intended for the public. This means writing in a clear, concise, and well-organized manner, making information easily understandable and usable by the public. The *Draft Plan* fails to meet the intent of this law.

Throughout the *Draft Plan*, starting on page 23, under Air Quality, we see the abbreviation (AQ). The reader goes, OK, I get AQ means air quality, but then the document goes on with FW-AQ-DC which means next to nothing, and then we get FW-ERCDIS-DC and MA2B-RNA-DC and it goes on and on. By the time the reader gets to page 64, under desired conditions for Local Communities we see FW-WTR-DC, FW-AQ-DC, FW-TRI-DC, FW-REC, and MAIA-DWA DCs. These Plan Component Codes, or abbreviations, which continue throughout the document, may mean something to the Bureaucrats, but they are distracting, and mean nothing to the ordinary reader.

When these abbreviations mean something that is important to the document, each should be written out in English.

Another factor distracting from readability, is when the Draft Plan refers to documents like the *PACFISH/INFISH Biological Opinion*, or *Assessment Report of Ecological, Social, and Economic Conditions on the Blue Mountains National Forests (September 2024)*, *National Forest Transportation Atlas*, or some other document. For readability, these documents should have pertinent portions included in the Plan. Even including these in an appendix doesn't work; see page 67 and 68 where it refers the reader to Appendix E. The reader should not be expected to find these documents, and then read and understand them in context with the Draft Plan information.

Consistency

The *Draft Plan* is not at all consistent when it comes to Plan Components. This makes it very difficult to understand each section, and how they fit together, when each is so different. The Draft Plan states on page 22 that the Aquatic and Riparian Conservation Strategy (ARCS) requires plan components to be desired condition, objectives, standards and guidelines and suitability determinations. There is no reference to suitability in the Plan component sections, and the reader must read Chapter 3 to find out what areas on the Forest are suitable for what activities. Suitability of lands should be included in the Plan Component section. It is too confusing to look at one section, then compare to the other section.

Then, in Chapter 2, the *Draft Plan* states they do not intend to comply with ARCS, but instead will simply provide a full range of plan components. However, far from a full range, some Plan Components include only an introduction, and the Desired Condition and a Standard (see page 24 for Air quality).

Some Plan components have Introduction, Desired Conditions and then these add Standards and Guideline. Standards and Guidelines become nothing more than sometimes illegal micro-management (see soils page 25) where they require all projects to maintain soil productivity. This standard does not take into account mining operations or building a road. If the Plan needs a soils standard, it should be that all projects are designed to minimize impacts to the soil recourse.

The Draft Plan states that guidelines are general guidance, but on page 49, where the guideline specifies pieces of wood, diameter and length for different forest types this one is so detailed it borders on the ridiculous. On the ground land managers must be allowed under a Forest Plan to make on the ground decisions based on what they have to work with on the ground.

The section on Wildfire goes even further with inconsistency. There is the Introduction, Desired Condition, and now they add Objectives to the list, and if that isn't enough, they then add Management Approach. The Management Approach section isn't even required, and as such should just be eliminated. This Management Approach section is sometimes very general and sometimes can be so detailed that an on the ground project manager would be left without the ability to make his/her own project decisions.

The Insect and Disease section has Desired Condition, Scale, but NO Standards, NO Objectives, NO Guidelines, but this one does have Management Approach, which isn't even necessary for the Plan. Again, there is simply no consistency.

All this is so confusing to the reader. All *Draft Plan* components should be consistent in the way they are described, and should be clear, concise, and well-organized. All should have the Desired Condition described and Standards and guidelines should be presented together as they did in the 1990 Forest Plan, and as NFMA requires. Standards and Guidelines must be general enough to allow on the ground managers to design and implement their projects.

Confusing Sections

One confusing section of the *Draft Plan* is on page 60-61 where there is a recommendation that sick or injured livestock, or dead carcasses be removed from the National Forest. The carcass is deep within the forest, weighs 1,000 pounds or more and all the roads are closed. Deer and elk die all the time and are left to rot or be eaten by carnivores and birds. Some of these recommendations are so dumb, the reader just focuses on these, and is distracted from understanding what the Plan Component section is attempting to say.

The transportation Infrastructure part of the plan on page 178 is quite confusing where it states *"Implementing measures (such as education, signage, law enforcement or seasonal road closures) to discourage encroachment of motorized vehicles into nonmotorized areas"*. This makes no sense, if it's a nonmotorized area, why would you have seasonal road closure? This section needs clarification.

On page 177 there is a very confusing statement under Social and Economic Sustainability; *"social well being (I think that means the public is happy) contributes to resilience (I think this means flexibility but I had to look the word up) in national forests by fostering public use patterns (not sure what these patterns are) but if it's using roads and the Forest Service will be fostering public use patterns by closing roads, then the Draft Plan should say this in plain English. If this part of the statement means something else, it should be rewritten so the public can understand. The rest of this sentence is equally confusing; "and restoration strategies, that*

help support human communities, livelihoods, cultures, and social values". What are examples of restoration strategies that could accomplish supporting "human communities, livelihoods, cultures, and social values"?

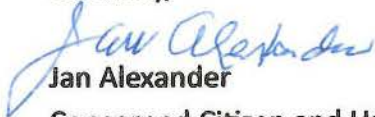
The next sentence is also confusing-what are the "outputs". An explanation of this word is needed. It should be noted also, that mining was left out of this confusing section. This whole section should be rewritten in plain English.

There are many other confusing sections throughout the Draft Plan. All the information, including suitability, should be presented for each resource area. Right now, there are guidelines scattered about under other resource areas, and many of these, which are really important to understanding what the Draft Plan is trying to say, are located clear at the back of the document under topics like "*Riparian Management*". A suggestion would be for the writer of each section to review another writer's work to see if it is written in plain language to the point that information is easily understandable and usable by the public.

In conclusion, the Draft Plan should be withdrawn and rewritten in in a clear, concise, and well-organized manner. Language should be easy to understand. If the Draft Plan is rewritten so it complies with the Plain Writing Act of 2010, the public will then be able to understand the Draft Plan and make comments on the content.

I appreciate the opportunity to comment on this *Draft Plan*.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jan Alexander".

Jan Alexander

Concerned Citizen and User of the National Forest